

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SOCIETE DES BAINS DE MER ET DU :
CERCLE DES ETRANGERS A MONACO, :

Plaintiff, :

08-CV-03157 (HB)

vs.

:

NOTICE OF MOTION

MGM MIRAGE and
VICTORIA PARTNERS, LP :

Defendants. :

-----X

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum in Support of Motion to Dismiss, the annexed Declaration of Brian L. Wright, sworn to May 19, 2008, the annexed Declaration of Jonathan W. Fountain, sworn to May 19, 2008, and all of the pleadings and proceedings had herein, Defendants MGM Mirage and Victoria Partners, LP, by their attorneys, White & Case LLP and Lewis and Roca LLP, hereby move before the Honorable Harold Baer, United States District Judge, at the U.S. Courthouse, 500 Pearl St., Room 2230, New York, NY 10007, for an Order dismissing Plaintiff's Complaint in its entirety pursuant to Rule 12(b)(2) and Rule 12(b)(3) of the Federal Rules of Civil Procedure and 28 U.S.C. § 1404(a), for lack of personal jurisdiction over any of the defendants, and improper venue, or to transfer this case to the District of Nevada, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
May 19, 2008

WHITE & CASE LLP

By: /s Jonathan E. Moskin

Jonathan E. Moskin (JM-9814)
E. Michelle Dean (ED-0104)
WHITE & CASE LLP
1155 Avenue of the Americas
New York, NY 10036
(212) 819-8200

-and-

Michael J. McCue (*pro hac vice* pending)
Jonathan W. Fountain (*pro hac vice* pending)
LEWIS AND ROCA LLP
3993 Howard Hughes Pkwy., Suite 600
Las Vegas, NV 89169
(702) 949-8200

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of May, 2008, I served a copy of **NOTICE OF MOTION** on the attorneys for the Plaintiff, as designated below, by ECF Filing as follows:

Robert L. Raskopf
Claudia T. Bogdanos
Jonathan Scharf
QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010

/s E. Michelle Dean _____
E. Michelle Dean
WHITE & CASE LLP
1155 Avenue of the Americas
New York, New York 10036